

Robert G. Drummond
Chapter 13 Standing Trustee
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(Trustee)

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MONTANA

In re)	
)	No. 19-61179-13
KRISTINE ROSE IHLI,)	
)	
Debtor.)	

MOTION OF TRUSTEE TO CONVERT AND NOTICE

Pursuant to 11 U.S.C. § 1307(e), the undersigned respectfully moves the Court to convert the above-entitled case to a case under Chapter 7. The grounds for this motion are as follows:

This Motion is based upon the estimated claim filed by the Internal Revenue Service, alleging that the Debtor has failed to file tax returns for the years 2016, 2017, and 2018. Thus, cause for conversion exists because the Debtor has failed to file all tax returns due through the year 2018 as required by 11 U.S.C. § 1308(a).

DATED December 26, 2019.

Chapter 13 Standing Trustee
P. O. Box 1829
Great Falls, MT 59403-1829

By /s/ Robert G. Drummond
Trustee

**NOTICE OF OPPORTUNITY TO RESPOND
AND REQUEST A HEARING**

If you object to the motion, you must file a written responsive pleading and request a hearing within fourteen (14) days of the date of the motion. The responding party shall schedule the hearing on the motion at least twenty-one (21) days after the date of the response and request for hearing and shall include in the caption of the responsive pleading in bold and conspicuous print the date, time and location of the hearing by inserting in the caption the following:

NOTICE OF HEARING

Date: _____

Time: _____

Location: _____

If no objections are timely filed, the Court may grant the relief requested as a failure to respond by any entity shall be deemed an admission that the relief requested should be granted.

DATED December 26, 2019.

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By /s/ Robert G. Drummond
Trustee

CERTIFICATE OF MAILING

I, the undersigned, do hereby certify under penalty of perjury that a copy of the within and foregoing **MOTION OF TRUSTEE TO CONVERT AND NOTICE** was sent by first class mail postage prepaid on December 26, 2019, at Great Falls, Montana, and directed to the following:

KRISTINE ROSE IHLI
3645 BEAR ACRES ROAD
BONNER, MT 59823

/s/ Tiffany Floerchinger
Tiffany Floerchinger